

JAMES E. NEUMAN, P.C.

Attorney at Law
100 Lafayette Street – Suite 501
New York, New York 10013

TEL 212-966-5612
FAX 646-651-4559
james@jamesneuman.com

March 27, 2023

Hon. Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *USA v Angel Hernandez*, 22 Cr. 702 (NRB)

Your Honor:


I write to ask that this Court modify the conditions of release for my client, Angel Hernandez. Since late December, 2022, Mr. Hernandez – who recently turned 19 years old – has been on home detention, living with his mother in the Bronx. According to his pre-trial services officer, Mr. Hernandez, has been in full compliance with the conditions of his bond. Recently, his pre-trial services officer suggested to me that his condition be changed to a curfew, with discretion to pre-trial to set the terms of the curfew. Among other things, this change would make it more convenient for Mr. Hernandez to pursue certain work opportunities.

The government consents to this application.

Accordingly, I ask that the conditions of release be modified by substituting the condition of home confinement with the condition of a curfew, to be set and monitored at the discretion of the pre-trial services office.

Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
March 28, 2023

Respectfully submitted,

/s/
James E. Neuman